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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

VISION SECURITY, LLC, a Utah Limited
Liability Company, ROB HARRIS, an
individual,

Plaintiffs,

v.

XCENTRIC VENTURES, LLC, an Arizona
Limited Liability Company,

Defendant.

**STIPULATED MOTION FOR ENTRY
OF SUMMARY JUDGMENT**

Case No. 2:13-CV-00926

Judge Jill N. Parrish
Chief Magistrate Judge Brooke C. Wells

Plaintiffs Vision Security, LLC and Rob Harris (collectively “Vision Security”), and
Defendant Xcentric Ventures, LLC (“Xcentric”), hereby stipulate and agree as follows:

1. On or about October 10, 2013, Vision Security filed its Complaint in this action asserting the following claims against Xcentric: defamation; tortious interference with prospective economic relations; violation of Utah’s Deceptive Trade Practices Act, Utah Code § 13-011a-3; and violation of the federal Lanham Act, 15 U.S.C. § 1125(A)(1).

2. On or about January 22, 2016, Vision Security filed its First Amended Complaint, which asserted the same claims.

3. On August 3, 2016, Xcentric filed a Motion for Summary Judgment seeking dismissal of all of Vision Security's claims based upon the statutory immunity provided by Section 230 of the Communications Decency Act, 47 U.S.C. § 230 ("Section 230 Immunity"), as well as other grounds.

4. Vision Security is not aware of any genuine issues of material fact that would prevent the application of Section 230 Immunity to Vision Security's claims, thus requiring dismissal of such claims.

5. Accordingly, Xcentric is entitled to judgment as a matter of law.

A proposed order is submitted concurrently herewith.

STIPULATED AND AGREED this 3rd day of October 2016.

EVANSON WEBER

/s/ R. Brett Evanson

R. Brett Evanson

Bradley J. Weber

Attorneys for Plaintiffs Vision Security, LLC and
Rob Harris

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/s/ Jeffrey J. Hunt

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Attorneys for Defendant Xcentric Ventures, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of October 2016, I served a copy of the foregoing **STIPULATED MOTION FOR ENTRY OF SUMMARY JUDGMENT** via the Court's CM/ECF System, on:

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